

OFFICES OF FREDERICK P. HAFETZ LLC

ATTORNEYS AT LAW

420 LEXINGTON AVENUE #2818
NEW YORK, N.Y. 10170
TELEPHONE: (212) 997-7400
TELECOPIER: (212) 997-7646

September 29, 2023

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: United States v. Gulkarov et al.
22-CR-00020 (PGG)

Dear Judge Gardephe:

I write with the consent of the government and Pretrial Services to respectfully request a modification of the terms of Mr. Gulkarov's bail conditions.

The terms of Mr. Gulkarov's pre-trial release require, *inter alia*, that he have no contact with his co-defendants outside of the presence of counsel. (Dkt. No. 57). However, yesterday, Mr. Gulkarov signed a plea agreement with the government, and the government has now agreed that Mr. Gulkarov may be allowed to fraternize with his co-defendant Roman Israilov subject to the condition that they not discuss the case pending against them outside the presence of counsel.

Accordingly, we respectfully request that Mr. Gulkarov's bail conditions be modified to allow him to fraternize with Roman Israilov, subject to the requirement that they not discuss the case against them outside of the presence of counsel and with all other bail conditions remaining unchanged. Pretrial Services does not object to this request.

If the Court consents to this bail modification application, I respectfully request that Your Honor "So Order" this letter.

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Date: October 3, 2023

Respectfully submitted,

s/ Noah E. Shelanski

cc: All counsel (via ECF)